

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORIES OCA/USPS-107-119 (November 18, 1997)

On November 12, 1997, the OCA filed a "Motion On Ascertainment of Library References Requiring Sponsorship and Designation as Evidence," as well as interrogatories OCA/USPS-107-118. On November 14, the OCA filed related interrogatory OCA/USPS-119. All of these materials relate, at some level, to the mail processing testimony of Postal Service witness Bradley, USPS-T-14. By separate pleading filed today, the Postal Service opposes the OCA's motion, and also addresses issues relating to the interrogatories. See "Response of the United States Postal Service in Opposition to the OCA Motion Regarding Library References H-148 and H-149 and Interrogatories OCA/USPS-107-119" (November 18, 1997). The instant pleading is filed independently to clarify, if necessary, the Postal Service's intent to preserve its objection to the interrogatories.

The Postal Service objects that these interrogatories are untimely, because they are nothing more than discovery on the Postal Service's direct case, and should have been filed no later than September 17th. For reasons fully set forth in the response to the motion (see pages 4-5), these interrogatories are not proper under Special Rule 2.E. Moreover, the response to the motion fully states the Postal Service's position that there is no basis under the Commission's rules or practice to require that discovery be reopened on these materials, despite the recent events and controversy that have arisen regarding totally distinct types of library references.

The Postal Service also objects on the grounds that response to these interrogatories would also be unduly burdensome. The basis for this objection is also fully articulated in the response to the motion (see footnote 8, pages 6-7). In general, these interrogatories relate to the OCA's determination, for its own purposes, to convert the analysis to a format which can be run on a personal computer. The burden of that effort should fall on the OCA, not on Dr. Bradley or the Postal Service.

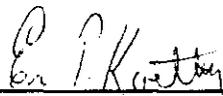
WHEREFORE, for the above reasons, and as discussed more fully in the response to the OCA's motion filed also filed today, the Postal Service objects to OCA interrogatories OCA/USPS-107-119.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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Eric P. Koetting

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Eric P. Koetting

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